

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

AMY CONNELLY,
PLAINTIFF,

vs.

CITY OF ST. ALBANS, VERMONT,
GARY TAYLOR,
JASON LAWTON,
ZACHARY KOCH,
MICHAEL FERGUSON
DEFENDANTS.

Civil Action No. 2:20-cv-64

STIPULATION REGARDING ACCEPTANCE OF SERVICE

The plaintiff and defendants Jason Lawton, Gary Taylor, City of St. Albans and Zachary Koch, by and through their respective counsel stipulate as follows:

1. The complaint in this case was filed on May 4, 2020.
2. Plaintiff intends to have defendants Lawton, Taylor, City of St. Albans and Koch personally served with the complaint and summons. In lieu of plaintiff incurring the expense of personal service, counsel for defendants have agreed to accept service by email.
3. The parties understand there is an issue regarding timely service under Fed. R. Civ. P. Rule 4(m). The acceptance of the complaint and summons by defense counsel is not a waiver of the 90-day service required under Rule 4(m). Defendant may raise late service by way of an affirmative defense or motion, and plaintiff may seek relief from the Court as appropriate. Neither party is prejudiced by this stipulation.

4. Defendants Lawton, Taylor, City of Albans and Koch shall have 60 days from the date this stipulation is approved by the Court to answer or otherwise respond to the Complaint.

DATED at Rutland, Vermont, this 30th day of July, 2021.

JASON LAWTON

By: /S/ Kaveh Shahi
Kaveh Shahi, Esq.
Cleary Shahi & Aicher P.C.
110 Merchants Row, Third Floor
Rutland, VT 05701
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802-775-8800

DATED at Brattleboro, Vermont, this 30th day of July, 2021.

AMY CONNELLY

By: /S/ Evan Chadwick
Evan Chadwick, Esq.
Chadwick & Spensley, PLLC.
Counsel for Plaintiff
136 High Street
Brattleboro, VT 05301
802-257-7161

DATED at Burlington, Vermont, this 30th day of July, 2021.

CITY OF ST. ALBANS

GARY TAYLOR

ZACHARY KOCH_____

By: /S/ Michael Leddy
Michael Leddy, Esq.
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SO ORDERED THIS ____ DAY OF _____, 2021.
